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DOCKET FILE COPY ORIGINAL

September 5, 2001

Mr. Clay Pendarvis, Chief
Television Branch
Video Services Division
Mass Media Bureau
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Docket No. 01-84
Bay City, Michigan

Dear Mr. Pendarvis:

This is in response to your August 3, 2001 letter concerning the above-referenced Petition for Rulemaking which requests the substitution of Channel 46 for Channel 61+ at Bay City, Michigan. Your letter states that the Commission staff reviewed the proposal and found that it failed to show adequate protection to DTV Channel 46 in Sarnia, Hanover and Stratford, Ontario. You requested that we conduct a technical analysis of the proposal in order to correct the deficiency and any other technical problems that might exist.

Attached hereto is an engineering statement prepared on behalf of the proponents of the channel substitution at Bay City, Michigan, Pelican Broadcasting, Inc. and Vista Communications, Inc. The engineering statement is filed one business day late because of computer problems which prohibited the consulting engineer from plotting some of the exhibits. We apologize for the delay. The statement addresses the September 29, 2000 Letter of Understanding (LOU) between the United States and Canada and notes that since the allocations are Class A allocations they are protected to 25 kilometers. The engineering statement also recites that a set of contours using a directional antenna at the specified rulemaking site will protect Hanover and/or Stratford while Sarnia will be protected as required by the terms of the LOU.

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It is respectfully submitted that the engineering statement resolves the questions raised in your August 3, 2001 letter and, accordingly, continued processing of the rulemaking proposal can move forward at this time.

Should any questions arise with regard to this matter, kindly communicate directly with this office.

Sincerely,

Bruce Eisen

Attachment

cc: James McLuckie, International Bureau
Vincent A. Pepper, Esq. (Fax - 202 -296-5572)

LIEBERMAN & WALISKO
CONSULTING TELECOMMUNICATIONS ENGINEERS
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SILVER SPRING, MD 20902

ENGINEERING STATEMENT

This engineering Statement is given in support of a response to a letter from the Staff regarding a Petition for Rulemaking (MM Docket No. 01-84) for Bay City Michigan.

The letter asks that Vista respond as to how the assignment of channel 46 at Bay City, Michigan will protect allocated DTV channel 46 in Sarnia, Hanover, and Stratford, Ontario, Canada.

As specified in the Letter of Understanding (LOU) between the United States and Canada, these allocations are Class A allocations. As such, they are protected to their 39 dBu, F(90,90) contour which in this case is 25 kilometers.

Additionally, the interfering contour can be no greater than 31.8 dBu F(50,10). Where the interfering signal is behind an imaginary receiving antenna, this interfering signal may be as high as 47.8 dBu F(50,10). The LOU does not describe what the ratio should be when the interfering signal is at a right angle (or some other angle other than in line and behind) to the receiving antenna.

Attached as Figure 1 is a plot of a set of contours using a directional antenna at the site specified in the rulemaking. These contours depict signal strengths of 47.8 and 31.8 dBu, F(50,10). Additionally, the plot shows that neither Hanover or Stratford is affected by the instant proposal and Sarnia is protected as required by the terms of the LOU. The plot was constructed using an antenna height of 548 m AAT and an ERP of 5000 kW.

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CONSULTING TELECOMMUNICATIONS ENGINEERS
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ENGINEERING STATEMENT (Cont'd)

Figure 2 is a polar plot of the proposed antenna and Figure 3 is a tabulation of the radiation values of the instant proposed antenna. This manufacturer has informed us this antenna has been constructed before and is not an idealized pattern.

The hereinstated information was prepared directly by me or under my direct supervision and is given under penalty of perjury.

9/4/01
Date

Melvyn Lieberman

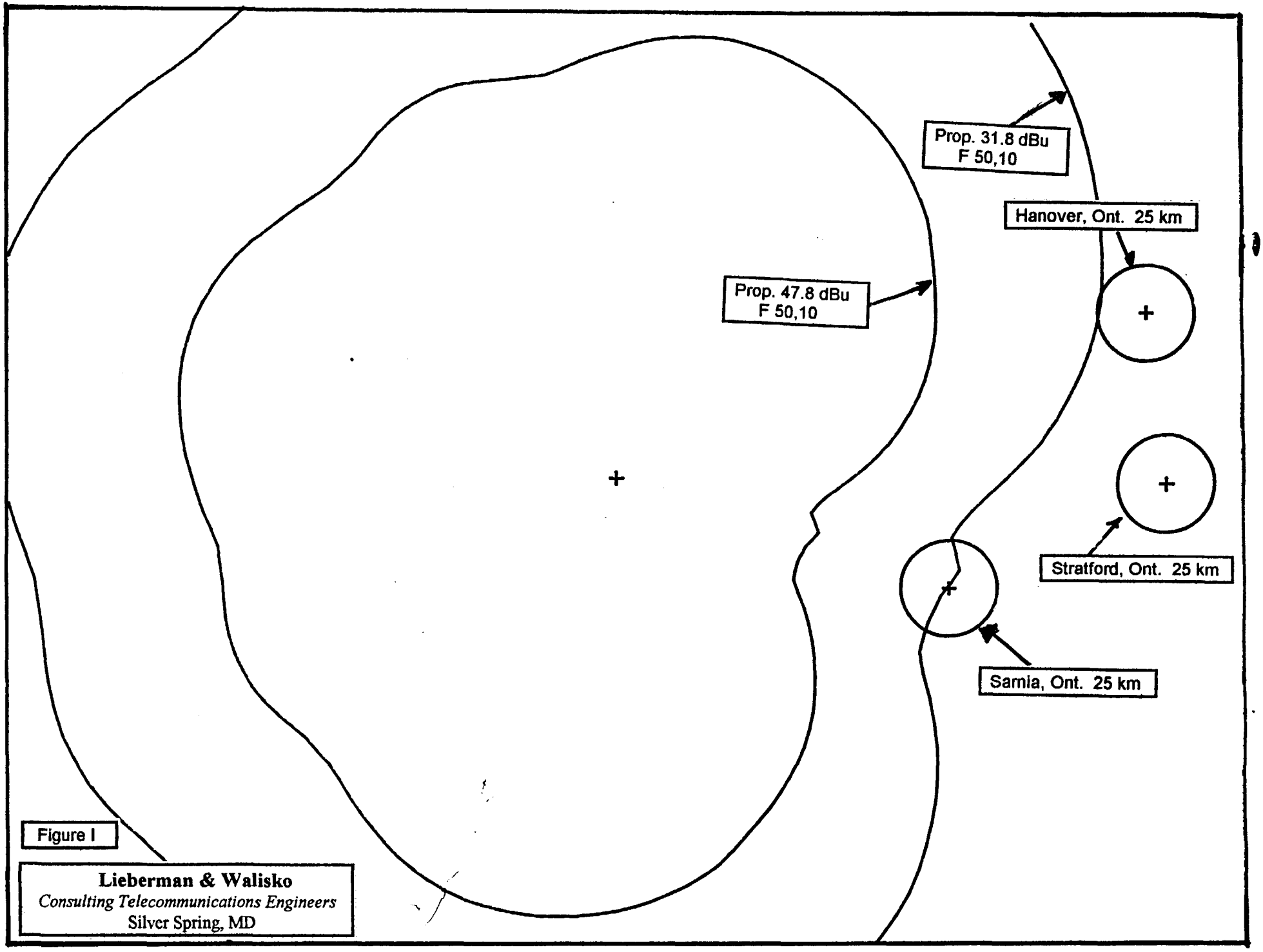
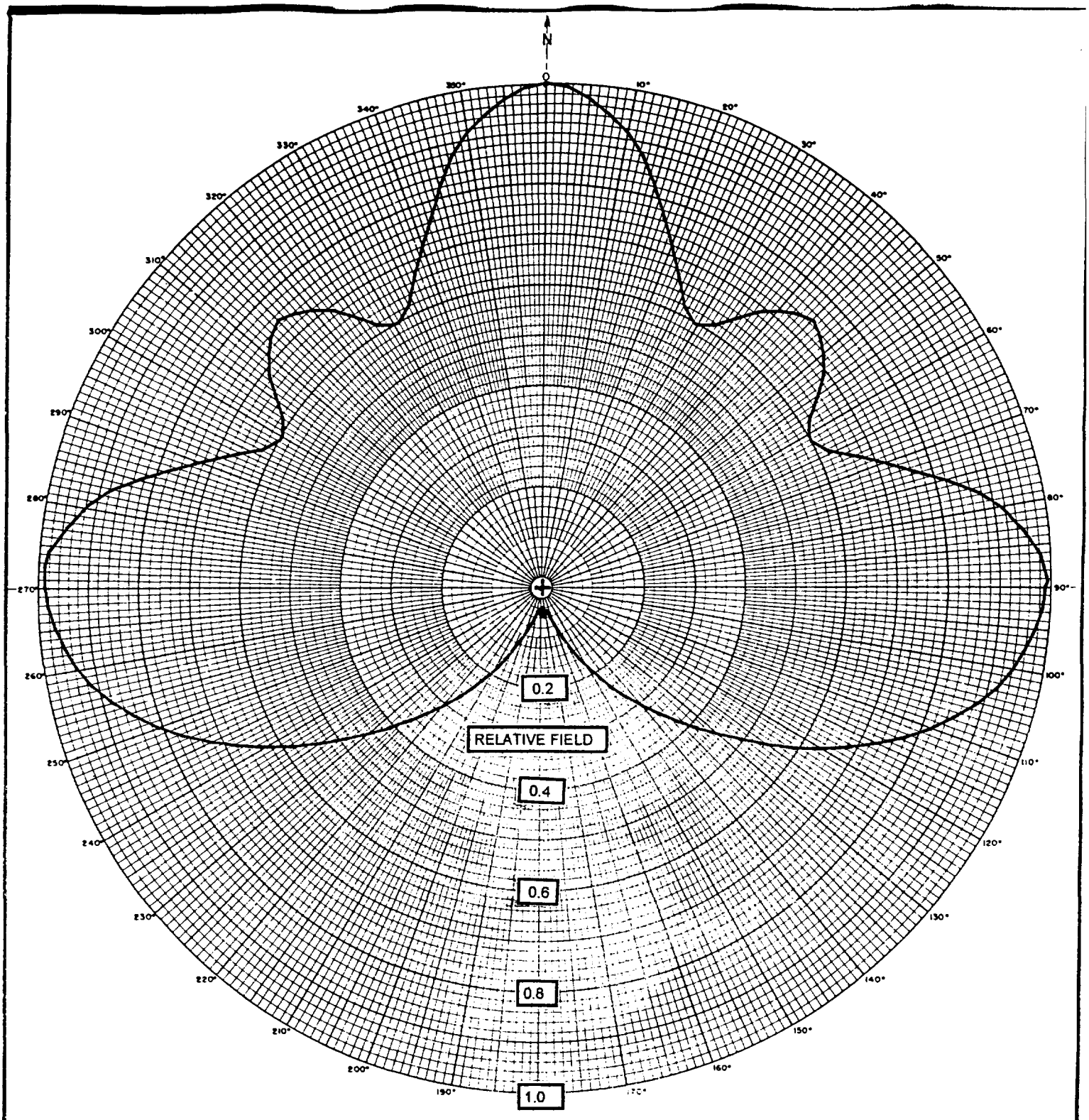


Figure I

Lieberman & Walisko
Consulting Telecommunications Engineers
Silver Spring, MD



ANTENNA TO BE ROTATED TO N 288° E

Figure 2

NEW – Bay City, MI

Proposed
Relative Field Pattern
Horizontal Plane

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NEW - Bay City, MI

Figure 3

TABULATION OF AZIMUTH PATTERN - RELATIVE VALUES

Antenna To Be Rotated to N 288° E

Non Rotated Pattern

0.0,1.00	180,0.038
10,0.915	183,0.058
20,0.720	190,0.045
29,0.599	200,0.091
30,0.600	210,0.184
40,0.716	220,0.305
45,0.748	230,0.448
50,0.716	240,0.633
60,0.600	250,0.811
61,0.599	260,0.936
70,0.720	270,0.988
80,0.915	271,0.994
89,0.994	280,0.915
90,0.988	290,0.720
100,0.936	299,0.599
110,0.811	300,0.600
120,0.633	310,0.716
130,0.448	315,0.748
140,0.305	320,0.716
150,0.184	330,0.600
160,0.091	331,0.599
170,0.045	340,0.720
177,0.058	350,0.915